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Attorneys for Defendants:

CITIGROUP I/S/H/A CITIBANK, N.A., STATE STREET BANK  
AND TRUST COMPANY AS OWNER TRUSTEE OF ZSF/OFFICE  
NY TRUST (solely in connection with their alleged ownership or occupancy  
of 111 Wall Street), 111 WALL STREET, LLC (solely in connection with  
their alleged ownership or occupancy of 111 Wall Street) and  
230 CENTRAL CO., LLC (solely in connection with their alleged ownership  
or occupancy of 111 Wall Street),

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
STANISLAW DROZDZ (AND WIFE, MONIKA  
DROZDZ)

Plaintiffs,

-against-

111 WALL STREET LLC, ET. AL.

Defendants.  
-----X

21 MC 102 (AKH)

Index No.: 06-CV-14620

**NOTICE OF ADOPTION OF ANSWER  
TO MASTER COMPLAINT**

**ELECTRONICALLY FILED**

PLEASE TAKE NOTICE, that defendants, CITIGROUP I/S/H/A CITIBANK, N.A., STATE STREET BANK AND TRUST COMPANY AS OWNER TRUSTEE OF ZSF/OFFICE NY TRUST (solely in connection with their alleged ownership or occupancy of 111 Wall Street), 111 WALL STREET, LLC (solely in connection with their alleged ownership or occupancy of 111 Wall Street) and 230 CENTRAL CO., LLC (solely in connection with their alleged ownership or occupancy of 111 Wall Street), by their attorneys, White & McSpedon, P.C., as and for their Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt their Answer to Master Complaint dated July 31, 2007, which

was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

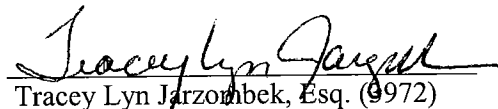
WHEREFORE, the defendants, CITIGROUP I/S/H/A CITIBANK, N.A., STATE STREET BANK AND TRUST COMPANY AS OWNER TRUSTEE OF ZSF/OFFICE NY TRUST (solely in connection with their alleged ownership or occupancy of 111 Wall Street), 111 WALL STREET, LLC (solely in connection with their alleged ownership or occupancy of 111 Wall Street) and 230 CENTRAL CO., LLC (solely in connection with their alleged ownership or occupancy of 111 Wall Street), demand judgment dismissing the above-captioned action as against them, together with their costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York  
September 5, 2008

Yours etc.,

WHITE & MCSPEDON, P.C.

By:



Tracey Lyn Jarzombek, Esq. (972)  
875 Avenue of the Americas, Suite 800  
New York, NY 10001  
(212) 564-6633

*Attorneys for Defendants*

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Street) and 230 CENTRAL CO., LLC (solely in connection with their  
alleged ownership or occupancy of 111 Wall Street),**

TO:  
(Service via electronic Pacer filing)

WORBY GRONER & NAPOLI BERN, LLP  
Plaintiffs Liaison  
In Re Lower Manhattan Disaster Site Litigation  
115 Broadway, 12<sup>th</sup> Floor  
New York, NY 10006  
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All Defense Counsel